

JUDGE SCHEINDLIN

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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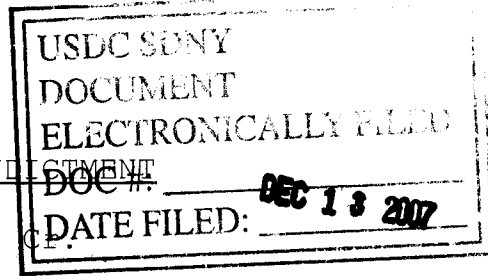
UNITED STATES OF AMERICA :

- v. - :

LISANDRA LUCIANO, :

Defendant. :

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07 CRIM 1154

COUNT ONE

(Conspiracy To Commit Bank Fraud)

The Grand Jury charges:

1. From in or about October 2003, up to and including in or about February 2005, in the Southern District of New York and elsewhere, LISANDRA LUCIANO, the defendant, and others known and unknown, unlawfully, willfully, and knowingly, did combine, conspire, confederate, and agree together and with each other to commit to violate Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that LISANDRA LUCIANO, the defendant, unlawfully, willfully, and knowingly would and did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain monies, funds, credits, assets, securities, and property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises.

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about September 24, 2002, in the Southern District of New York, LISANDRA LUCIANO, the defendant, opened a checking account with Fleet Bank.

b. On or about June 8, 2004, in the Southern District of New York, LUCIANO opened a checking account with Fleet Bank.

c. On or about November 17, 2004, in the Southern District of New York, LUCIANO opened a checking account with Fleet Bank.

d. On or about November 17, 2004, in the Southern District of New York, LUCIANO opened another checking account with Fleet Bank.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Bank Fraud)

The Grand Jury further charges:

4. From in or about October 2003, up to and including in or about February 2005, in the Southern District of New York and elsewhere, LISANDRA LUCIANO, the defendant, unlawfully, willfully, and knowingly, did execute and attempt to execute a

scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, LUCIANO withdrew the proceeds of stolen United States Treasury checks, which were fraudulently endorsed and deposited into LUCIANO's checking account with Fleet Bank.

(Title 18, United States Codes, Section 1344, 2.)

COUNT THREE

(Theft of Government Property)

The Grand Jury further charges:

5. From in or about October 2003, up to and including in or about February 2005, in the Southern District of New York and elsewhere, LISANDRA LUCIANO, the defendant, unlawfully, willfully, and knowingly, did embezzle, steal, purloin, and convert to her own use and the use of another, and without authority, did sell, convey, and dispose of a thing of value exceeding \$1,000 of the United States and a department and agency thereof, and did receive, conceal, and retain the same with intent to convert it to her own use and gain, knowing it to have

been embezzled, stolen, purloined, and converted, to wit, LUCIANO fraudulently permitted checks issued by the United States Treasury, to which she was not entitled, to be deposited into her bank account, and withdrew the proceeds of those checks.

(Title 18, United States Code, Sections 641 and 2.)

  
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Foreperson

  
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MICHAEL J. GARCIA

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v -

LISANDRA LUCIANO,

Defendant.

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INDICTMENT

07 Cr.

(18 U.S.C. §§ 1349, 1344, 641, 2)

MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL



Foreperson.

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